

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: §
§
FREE SPEECH SYSTEMS, LLC, § **Case No. 22-60043**
§
DEBTOR. § **Chapter 11 (Subchapter V)**
§

**AMENDED DECLARATION OF NORMAN A. PATTIS IN SUPPORT OF
THE DEBTOR'S APPLICATION TO EMPLOY PATTIS & SMITH LLC
UNDER 11 U.S.C. § 327(e) AND 328(a), AS SPECIAL COUNSEL,
NUNC PRO TUNC, TO AUGUST 1, 2022**

I, Norman A. Pattis, declare under penalty of perjury as follows:

1. I am an attorney at law duly admitted and in good standing to practice in the State of Connecticut.
2. I am making this Amended Declaration in support of the Debtor's Emergency Application to Employ Pattis & Smith LLC Under 11 U.S.C. § 327(e) and 328(a), as Special Counsel, *Nunc Pro Tunc*, to August 1, 2022 (the "Application"). Unless otherwise indicated, capitalized terms used but not defined herein have the meanings ascribed to such terms in the Application.
3. Except as otherwise noted, all facts set forth in this Amended Declaration are based upon my personal knowledge, upon the client and matter records of Pattis & Smith LLC ("P&SLLC") reviewed by me or derived from information available to me that I believe to be true and correct or opinion based upon experience, knowledge and information concerning the restructuring of debtor-creditor relationships, workouts, chapter 11 process, and the Debtor. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

4. On August 22, 2022, I executed a Declaration (the “Original Declaration”) in support of the Debtor’s Application.

5. In ¶ 10 of the Original Declaration, I stated that:

I conducted a search of P&SLLC files to determine using the list of parties in interest listed in Schedule 1 hereto whether the Firm had any connections to or represented any of the parties listed on Schedule 1. The search revealed that the Firm had and did not represent any of the parties listed on Schedule 1. P&SLLC may have provided services to creditors or other parties in interest inadvertently omitted from Schedule 1 or the description above. If such connections exist, they would be on matters wholly unrelated to the service for which FSS seeks to engage P&SLLC.

6. Schedule 1 to the Original Declaration listed “Debtor’s Equity: Alexander E. Jones”.

7. As set out in ¶¶ 6, 7, 8 of the Application and Exhibit “A” to the Engagement Agreement, Applicant has represented other defendants, including Alex E. Jones.

8. In ¶ 11 of the Application, FSS stated that “The Firm is not receiving any compensation for Professional Services by any other defendant in the Sandy Hook Lawsuits.”

9. As a result of negotiations with certain parties, Alex E. Jones will bear 40% of my Firm’s 3 monthly \$100,000.00 flat fees, with Alex Jones, paying all of August, 2022 flat fee to the Firm and FSS and Alex Jones paying the Firm \$100,000 and \$0 respectively for September 2022 monthly flat fee, and \$80,000 and \$20,000 respectively for October 2022 monthly flat fee. Therefore, ¶ 11 of the Application is no longer accurate and correct.

10. I am filing this Amended Declaration to update ¶ 11 in the Application.

11. Except for these amendments to my Declaration and Application set out herein, all other statements made in the Application and Original Declaration remain true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2022,

By: /s/Norman A. Patis
Norman A. Patis